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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,

Plaintiff,

vs.

Ryan Adelbert Johnson, et. al.,

Defendants.

No. CR-25-08032-PCT-DLR

**JOINT SUPPLEMENTAL
MEMORANDUM REGARDING
PROPOSED SCHEDULING ORDER**

This Court granted the parties' Joint Motion for Complex Case Designation. (Docs. 43, 42). Subsequently, the parties submitted a Joint Proposed Scheduling Order and Request for Additional Status Conferences. (Doc. 44). At the telephonic status conference on June 17, 2025, the Court requested a supplemental filing to support the parties' request for a September 29, 2026 firm trial date.

The complex nature of this case has been agreed upon by the parties, with approval of the Court. Therefore, without repeating what was included in the parties' Joint Motion for Complex Case Designation (Doc. 42), a September 29, 2026 firm trial date is warranted for the following reasons.

1 The sheer number of defendants, the number and nature of the charges, and the
2 voluminous discovery necessitate a lengthy time-period for all counsel to investigate the
3 facts, analyze any legal or factual issues, and properly prepare for trial. While a
4 superseding indictment is anticipated, as of this date, three of the four defendants are
5 charged with felony murder under 18 U.S.C. §§ 1153 and 1111, which carries a mandatory
6 sentence of life imprisonment. All four defendants are currently in custody at the
7 CoreCivic detention facility in Florence, Arizona, requiring defense counsel to travel over
8 two hours round trip for each visit. Given the seriousness of the charges and the substantial
9 volume of discovery, considerable time is needed to travel, meet with the defendants, and
10 thoroughly review the evidence with them to ensure adequate preparation for trial.

11 To flush this out a little more, per the Court's request, the discovery includes
12 information about several related investigations and a number of additional involved
13 individuals, who are potential witnesses in this case. Furthermore, the discovery contains
14 an enormous amount of electronic evidence, which continues to be analyzed and disclosed
15 by the United States. This will not only take a lengthy amount of time for the defense to
16 download and review, but also may necessitate expert review. In addition to the electronic
17 evidence, there is a significant amount of scientific analysis as part of this investigation
18 and included in the discovery materials. The United States anticipates presenting a number
19 of experts from numerous different disciplines, which will naturally require defense
20 consideration of retaining experts as the results of scientific testing continue to be received.

21 Lastly, when counsel conferred, the proposed September 29, 2026 trial date was a
22 date that worked for all counsel and their respective trial calendars. Importantly, and
23 related to these issues mentioned above, as this Court is undoubtedly aware, all defense
24 counsel on this matter are members of the CJA panel and thus are subject to the various
25 administrative requirements and limitations imposed by both the Court and Congress. As
26 of the date of this filing, counsel have been informed that the current pool of funds which
27 is available to pay counsel, experts, investigators and other necessary service providers will
28

1 be exhausted by July 23, 2025—and may even occur earlier. Assuming that this budgeting
 2 issue is resolved by Congress in a timely manner, defense counsel have taken the expected
 3 delay in payment for services rendered by all parties who are subject to payment under the
 4 terms of the Criminal Justice Act into consideration and agree that the current proposed
 5 trial schedule is in their individual clients' best interest. The proposed schedule should
 6 allow for enough time to resolve the current budgeting issues which will then allow for the
 7 retention and payment of both service providers and counsel, and will allow counsel
 8 sufficient time to prepare for trial.

9 All counsel have conferred and join in the filing of this supplemental memorandum,
 10 in anticipation of the next telephonic status hearing, scheduled for July 10, 2025 at 9:30
 11 a.m. All counsel have conferred with their respective clients who have agreed to waive
 12 their presence at the telephonic status hearing, and have also agree to waive any applicable
 13 time and believe it is in their best interest to proceed with a September 29, 2026 trial date.

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 15 TIMOTHY COURCHAIINE
 16 United States Attorney
 District of Arizona

17 *s/Dimitra H. Sampson*
 18 DIMITRA H. SAMPSON
 19 ALANNA R. KENNEDY
 Assistant U.S. Attorneys

20 **CERTIFICATE OF SERVICE**

21 I hereby certify that on June 18, 2025, I electronically transmitted the attached
 22 document to the Clerk's Office using the CM/ECF System for filing a copy to the following
 23 CM/ECF registrants: Diego Rodriguez, Brandon Cotto, Eric Kessler, and George Klink,
 24 *Attorneys for Defendants Ryan Johnson, Alexandra Johnson, Charles Truax, and Mike*
Duffy, III.

25 *s/Keona L. Ross*
 26 U.S. Attorney's Office